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NPDES Permit Tracking No:
MAR05CY84



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

GENERAL INFORMATION

1. Facility Name: W T e R e c y c l i n g I n c

2. NPDES Permit Tracking No.: M A R 0 5 C Y 8 4

3. Facility Physical Address:

a. Street: 7 5 S O U T H E R N A V E

b. City: G R E E N F I E L D

c. State: M A d. Zip Code: 0 1 3 0 1 - 3 9 1 3

4. Lead Inspectors Name: J C L A I B O R N E T H O R N T O N Title: C O N S U L T A N T

Additional Inspectors Name(s): E D W A R D W R I S L E Y Title: C H A R L E S F A U L S T I C H

5. Contact Person: C H A R L E S F A U L S T I C H Title: S R E N G I N E E R

Phone: 7 8 1 - 2 7 5 - 6 4 0 0 Ext 1 1 1 E-mail: C F A U L S T I C H @ W T E . C O M

6. Inspection Date: 0 8 / 0 9 / 2 0 1 2

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?

☒ YES ☐ NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☒ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

The discharge pipe feeds a rocky swale – no evidence of erosion or scouring.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

☒ YES ☐ NO

If YES, how many conditions requiring review for corrective actions as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?

1

NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas, and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA 1:

1. Brief Description:

Entire metals recycling facility

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised control measures necessary in this area? ☒ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Benchmark exceedence

INDUSTRIAL ACTIVITY AREA _____

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 1 of 1 for this reporting period.

2. Is this corrective action:

- ☒ An update on a corrective action from a previous annual report; or
☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark exceedance

5. Date problem identified: 12/08/2011

6. How problem was identified:

- ☐ Comprehensive site inspection
☐ Quarterly visual assessment
☐ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

See attached Quarterly Stormwater Benchmark Monitoring Reports.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated 12/09/2011

10. Date corrective action completed: / / or expected to be completed: / /

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

The most recent test results (9/5/2012) all met the benchmarks with the exception of copper.
See attached July-September 2012 Benchmark Monitoring Report.

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E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☒ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative:

Printed Name:

Charles Faulstich

Title:

Sr. Engineer

Signature:

Charles Faulstich

Date Signed:

9/27/12

October – December 2011 Benchmark Monitoring Report wTe Recycling, Inc.

The MSGP requires a corrective action report (1) if the average of four quarterly sampling results exceeds an applicable benchmark, or (2) if fewer than four benchmark samples have been taken and the results are such that an exceedence of the four quarter average is mathematically certain. The corrective action report consists of documenting the discovery within 24 hours of making the discovery, and documenting the corrective action taken or to be taken within 14 days of making the discovery.

Sample Date: November 10, 2011

Sample Analysis Received: December 7, 2011

Documentation of Discovery of Conditions Requiring a Corrective Action Report: December 8, 2011

Documentation of Response to Discovery: December 9, 2011

Sample Analysis Results Electronically Submitted to EPA: December 9, 2011

Documentation of Discovery

1. The storm water analysis results for the sample taken on November 10, 2011 were received at wTe from EAI Analytical Labs on December 7, 2011.
2. The results exceeded the benchmarks for aluminum, copper, iron, lead, and zinc.
3. This was identified on December 7, 2011.

Response to Discovery

1. Modification of catch basin number 29 to include a moat that will accommodate hay bales was completed in late November 2011. Evaluate the addition of new, customized catch basins at other locations in the yard to further improve storm water run-off water quality.
2. The post-burn "nails" processing system has been replaced with a new program that results in a reduction of the separated "nails" fraction by 60 percent or more. This new program also results in a significant reduction of time, movement, and handling of certain post-burn streams in the yard, thus reducing the potential for run-off. This new program will be run and evaluated during Q4 2011 and Q1 2012.
3. Complete the replacement of the mill building septic system with a town sewer connection. Most of this work has been completed, and the goal is to complete the project by the end of 2011.
4. Develop several preliminary design options for a roof to cover a portion of the PIF receiving area. This project has high risk and may not be achievable. Management intends on conducting the preliminary evaluation during Q1 of 2012.

5. Complete the installation of a moat around catch basin 12. This project is scheduled to be completed during the week ending December 16, 2011.

January – March 2012 Benchmark Monitoring Report wTe Recycling, Inc.

The MSGP requires a corrective action report (1) if the average of four quarterly sampling results exceeds an applicable benchmark, or (2) if fewer than four benchmark samples have been taken and the results are such that an exceedence of the four quarter average is mathematically certain. The corrective action report consists of documenting the discovery within 24 hours of making the discovery, and documenting the corrective action taken or to be taken within 14 days of making the discovery.

Sample Date: March 13, 2012

Sample Analysis Received: March 23, 2012

Documentation of Discovery of Conditions Requiring a Corrective Action Report: March 23, 2012

Documentation of Response to Discovery: March 26, 2012

Sample Analysis Results Electronically Submitted to EPA: March 26, 2012 (submitted for certification)

Documentation of Discovery

1. The storm water analysis results for the sample taken on March 13, 2012 were received at wTe from EAI Analytical Labs on March 23, 2012.
2. The results exceeded the benchmarks for copper, iron and zinc.
3. This was identified on March 23, 2012.

Response to Discovery

1. Retain a consultant to determine how to reduce the concentration of copper, iron and zinc in the stormwater.
2. Purchase a third sweeping device for the purpose of more complete and frequent ground cleaning. This sweeper should be operational by April 30, 2012.
3. Construct another catch basin moat system. This will be constructed by June 30, 2012.

April – June 2012 Benchmark Monitoring Report wTe Recycling, Inc.

The MSGP requires a corrective action report (1) if the average of four quarterly sampling results exceeds an applicable benchmark, or (2) if fewer than four benchmark samples have been taken and the results are such that an exceedence of the four quarter average is mathematically certain. The corrective action report consists of documenting the discovery within 24 hours of making the discovery, and documenting the corrective action taken or to be taken within 14 days of making the discovery.

Sample Date: June 12, 2012

Sample Analysis Received: June 26, 2012

Documentation of Discovery of Conditions Requiring a Corrective Action Report: June 27, 2012

Documentation of Response to Discovery: June 28, 2012

Sample Analysis Results Electronically Submitted to EPA: July 3, 2012 (certified on July 5)

Documentation of Discovery

1. The storm water analysis results for the sample taken on June 12, 2012 were received at wTe from EAI Analytical Labs on June 26, 2012.
2. The results exceeded the benchmarks for copper and iron.
3. This was identified on June 26, 2012.

Response to Discovery

1. Sources of exposed copper will be searched for, and if found, plans for preventing contact with rainwater will be developed.
2. Debris will be removed from the drainage swale and the swale will be lined with stone.
3. Additional silt moats will be considered.

July – September 2012 Benchmark Monitoring Report wTe Recycling, Inc.

The MSGP requires a corrective action report (1) if the average of four quarterly sampling results exceeds an applicable benchmark, or (2) if fewer than four benchmark samples have been taken and the results are such that an exceedence of the four quarter average is mathematically certain. The corrective action report consists of documenting the discovery within 24 hours of making the discovery, and documenting the corrective action taken or to be taken within 14 days of making the discovery.

Sample Date: September 5, 2012

Sample Analysis Received: September 14, 2012

Documentation of Discovery of Conditions Requiring a Corrective Action Report: September 14, 2012

Documentation of Response to Discovery: September 17, 2012

Sample Analysis Results Electronically Submitted to EPA: September 20, 2012

Documentation of Discovery

1. The storm water analysis results for the sample taken on September 5, 2012 were received at wTe from EAI Analytical Labs on September 14, 2012.
2. The results exceeded the benchmarks for copper.
3. This was identified on September 14, 2012.

Response to Discovery

1. Sources of exposed copper will be searched for, and if found, plans for preventing contact with rainwater will be developed.
2. The drainage swale will be lined with stone.
3. Additional silt moats will be considered.



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September 27, 2012

U.S. Environmental Protection Agency
Office of Water, Water Permits Division
Mail Code 4203M, ATTN: MSGP Reports
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Subject: Annual Report, NPDES Permit Tracking No: MAR05CY84

Dear Sir or Madam:

Enclosed is wTe Recycling, Inc.'s Year Four Annual Report as required by the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity from Scrap Recycling and Waste Recycling Facilities.

Included in this submittal are the following items:

- The completed report form from Appendix I of the Permit
- The 2012 Annual Comprehensive Site Compliance Evaluation forms completed by our consultant J. Claiborne Thornton III, P.E. of W. Z. Baumgartner and Associates
- Four Stormwater Benchmark Monitoring Reports for the 2011 – 2012 period.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles N. Faulstich", written over a horizontal line.

Charles N. Faulstich
wTe Corporation

attachments